

ESTTA Tracking number: **ESTTA611858**

Filing date: **06/24/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056611
Party	Plaintiff Evergreen Media Holdings, LLC
Correspondence Address	LAURA GOLDBARD GEORGE STROOCK & STROOCK & LAVAN LLP 180 MAIDEN LANE NEW YORK, NY 10038 4892 UNITED STATES lgoldbard@stroock.com, tm@stroock.com
Submission	Other Motions/Papers
Filer's Name	Laura Goldbard George
Filer's e-mail	lgoldbard@stroock.com, tm@stroock.com
Signature	/laura goldbard george/
Date	06/24/2014
Attachments	Response - Evergreen v WWE.pdf(71224 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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EVERGREEN MEDIA HOLDINGS, LLC	:	
	:	
Petitioner,	:	
	:	
v.	:	Proceeding No. 92/056,611
	:	Registration No. 3,945,854
	:	Mark: NXT ROOKIE
WORLD WRESTLING ENTERTAINMENT	:	
	:	
Registrant.	:	
-----X		

Commissioner for Trademarks  
P.O. Box 1451  
Arlington, Virginia 22313-1451

**RESPONSE TO COMMUNICATION DATED JUNE 24, 2014 AND  
REVISED MOTION TO WITHDRAW AS ATTORNEY**

In response to the Communication dated June 24, 2014, the undersigned hereby submits this revised Motion to Withdraw. The undersigned responds to each point raised as follows which also form the bases for the Motion to Withdraw:

(1) The bases of the request to withdraw include (a) the unreasonable financial burden that Petitioner has placed on the undersigned and (b) Petitioner's lack of communication with the undersigned;

(2) The undersigned notified the Petitioner by email, FedEx and mail at least two months before the expiration of the response period that the Motion to Withdraw as Attorney would be filed, allowing time for employment of another practitioner, and subsequently notified the Petitioner by email on June 2, 2014 that the Motion was filed;

(3) All documents and property that relate to the proceeding and to which the client is entitled have been delivered to the Petitioner;

(4) Petitioner has been notified of all deadlines. The next deadline is September 2, 2014;


(5) Petitioner has not paid in advance for any services provided by the undersigned; and

(6) With regard to proof of service upon the client and upon every other party to the proceeding, the Motion is being served on Petitioner and counsel for Registrant as reflected in the attached Certificate of Service.

In view of the foregoing, the undersigned has responded to the June 24, 2014 Communication and respectfully requests that the Motion to Withdraw as Attorney be granted.

Respectfully submitted,

STROOCK & STROOCK & LAVAN LLP  
Attorneys for Petitioner  
180 Maiden Lane  
New York, New York 10038-4982  
(212) 806-5400

By   
Laura Goldbard George

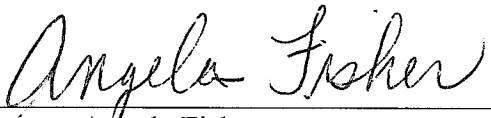
Dated: New York, New York  
June 24, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing RESPONSE TO COMMUNICATION DATED JUNE 24, 2014 AND REVISED MOTION TO WITHDRAW AS ATTORNEY was served on Petitioner by email and First Class Mail as follows:

Mr. Tony DeRosa-Grund  
Evergreen Media Holdings, LLC  
923 High meadow Ranch Drive  
Magnolia, TX 97355  
[tonydg@evergreenmediagroup.com](mailto:tonydg@evergreenmediagroup.com)

I also certified that a copy of the foregoing RESPONSE TO COMMUNICATION DATED JUNE 24, 2014 AND REVISED MOTION TO WITHDRAW AS ATTORNEY was served on counsel for Registrant by forwarding a copy by electronic mail (by agreement) to Christopher Verdini, at [Christopher.Verdini@klgates.com](mailto:Christopher.Verdini@klgates.com) on June 24, 2014.

  
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Angela Fisher